

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

M.H., et. al,

Plaintiffs,

v.

Omegle.com, LLC,

Defendant.

Civil Action No. 2:20-cv-11294-KM-JBC

**CERTIFICATION OF
VENKAT BALASUBRAMANI,
ESQ. PURSUANT TO LOCAL
RULE 101.1(c)**

I, Venkat Balasubramani, Esq., hereby certify the following facts:

1. I am over 18 years of age and the facts set forth below are based upon my personal knowledge. If called upon to testify, I could and would testify competently to the matters set forth herein.

2. I am an attorney at law admitted to practice and in good standing (*i.e.*, currently authorized to practice as an attorney) in the following United States court(s) and/or state's highest court(s): the courts of the states of Washington (1998), California (1997), and Oregon (2018); the United States District Court for the Western District of Washington (2002); the United States District Court for the Eastern District of Washington (2017); the United States District Court for the Northern District of California (2007); the United States District Court for the Central District of California (2003); the United States District Court for the

Southern District of California (2003); the United States District Court for the Eastern District of California (2006); the United States Court of Appeals for the First Circuit (2007); and the United States Court of Appeals for the Ninth Circuit (2003).

3. I am counsel for Defendant Omegle.com, LLC in the above captioned matter.

4. I am a resident of the State of Washington.

5. I am a member of the law firm of Focal PLLC, with an office address of 900 1st Avenue S., Suite 201, Seattle, Washington 98134, telephone number 206-529-4827, and email address venkat@focallaw.com.

6. I am not regularly engaged in business or professional activities in the State of New Jersey. I have had no other temporary admissions in the State of New Jersey in the past five years.

7. I submit this certification in support of my application for admission to this Court *pro hac vice*, pursuant to Local Civil Rule 101.1(c), for this matter.

8. I am in compliance with all of the requirements set forth under Local Civil Rule 101.1(c) for admission *pro hac vice*.

9. I am licensed to practice in the State of Washington and was licensed on October 28, 1998. My attorney registration number is 28269. I am a member of the Bar in good standing in the State of Washington. The name and address of the

office maintaining the roll of Washington Bar members is: Washington State Bar Association, 1325 4th Ave., Suite 600, Seattle, Washington 98101. Attached hereto as Exhibit 1 is a true and accurate copy of my Certificate of Good Standing in Washington.

10. I have never been suspended, disbarred, or resigned as a result of any disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction.

11. There are no disciplinary proceedings pending against me in any jurisdiction.

12. Upon admission to appear *pro hac vice*, I will forthwith make payment in the amount of \$150 payable to the Clerk, U.S. District Court in accordance with Local Civil Rule 101.1(c)(3).

13. Pursuant to Local Civil Rule 101.1, upon admission to appear *pro hac vice*, I will submit a signed copy of the Order together with payment in the amount of \$150 to the New Jersey Lawyer's Fund for Client Protection.

14. Good cause exists for the request for temporary admission. I have knowledge of the underlying case, specialized knowledge of internet law, and an extended attorney-client relationship with Defendant. I have been assisting the Defendant in preparing its defense in this matter.

15. I shall abide by the New Jersey Court Rules, including all disciplinary rules.

16. James T. Prusinowski, Esq., of Trimboli and Prusinowski, LLC, 268 South Street, Morristown, NJ 07960, has appeared and agreed to act as co-counsel.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated November 13, 2020



VENKAT BALASUBRAMANI, ESQ.

EXHIBIT 1

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION)	BAR NO. 28269
)	
OF)	CERTIFICATE
)	
VENKAT BALASUBRAMANI)	OF
)	
TO PRACTICE IN THE COURTS OF THIS STATE)	GOOD STANDING
)	

I, Susan L. Carlson, Clerk of the Supreme Court of the State of Washington, hereby certify

VENKAT BALASUBRAMANI

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on October 28, 1998, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said Court this 29th day of October, 2020.

A handwritten signature in black ink, appearing to read "Susan L. Carlson", written over a horizontal line.

Susan L. Carlson
Supreme Court Clerk
Washington State Supreme Court